

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

AMANI M. ABBASI,

Plaintiff,

v.

RITZ CAMERA CENTERS, INC.,

Defendant.

Case No.08 C 506

Hon. Judge Der-Yeghiayan

Motion for Extension of Time for Discovery

NOW COMES Plaintiff Amani Abbasi, by and through undersigned counsel, and moves this Honorable Court for an extension of time to complete discovery, pursuant Rule 6 (b)(1) of the Federal Rule of Civil Procedures, and in support thereof states as follows:

1. Plaintiff's lead counsel, Patricia Kemling, no longer works at CAIR-Chicago and will be moving to withdraw from representation. CAIR-Chicago is in the process of hiring a new staff attorney and that individual will represent Plaintiff.
2. Plaintiff has, thus far, has provided timely response to all the Defendant's interrogatories and production requests.
3. Plaintiff, however, seeks more time for completion of discovery and proposes the deadline for fact discovery be adjusted from July, 18, 2008 to September 18, 2008.

Accordingly, Plaintiff respectfully requests that the discovery deadlines be extended as proposed herein.

Respectfully submitted,

s/ Rima Kapitan

Rima N. Kapitan, Esq.
Attorney # 6286541
CAIR-Chicago
28 East Jackson Blvd., Suite 1410
Chicago, Illinois 60604
Ph: 312.212.1520
Fax: 312.212.1530
rima@cairchicago.org

CERTIFICATE OF SERVICE

I, Rima Kapitan, hereby certify that on July 7, 2008 I filed electronically the foregoing Motion for Extension of Time for Discovery, which constitutes service to Carmen Copher, copherc@jacksonlewis.com, and Jane McFetridge, mcfetrij@jacksonlewis.com, who are registered participants of the CM/ECF system.

s/ Rima Kapitan

Rima N. Kapitan, Esq.
Attorney # 6286541
CAIR-Chicago
28 East Jackson Blvd., Suite 1410
Chicago, Illinois 60604
Ph: 312.212.1520
Fax: 312.212.1530
rima@cairchicago.org